PATENT Docket No.: NL040323US Customer No. 000024737

#### REMARKS

By this amendment, claims 1-10 have been amended. New claims 11-20 have been added to provide more complete claim coverage. Claims 1-20 remain in the application. Support for the amendments to the claims can be found the specification and drawings. No new matter has been added. Reconsideration, and allowance of the application, as amended, is respectfully requested.

### Rejection under 35 U.S.C. §112

Claims 1-10 were rejected under 35 U.S.C. §112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Applicant respectfully traverses this rejection for at least the following reason. Claims 1-10 have been amended to remove any indefiniteness and to more clearly point out and distinctly claim the subject matter which the applicant regards as the invention. Accordingly, the 35 U.S.C. § 112 rejection of claims 1-10 has now been overcome. Withdrawal of the rejection is respectfully requested.

## Rejection under 35 U.S.C. §102

Claim 1 recites a light-guiding device having a coupling-in surface for coupling-in light radiation substantially in a first main direction perpendicular to said coupling-in surface, and having a coupling-out surface for coupling-out light radiation substantially in a second main direction perpendicular to said couplingout surface, wherein the coupling-out surface has dimensions other than those of the coupling-in surface, characterized in that the device comprises a number of light-guiding members, each light-guiding member being configured in the form of a substantially planar plate and (i) having a substantial rectangular lateral coupling-in surface, (ii) two lateral outer surfaces bordering the rectangular lateral coupling-in surface configured to narrow an angular distribution of light

radiation around the first main direction, and (iii) a substantially rectangular lateral coupling-out surface, wherein a number of the light-guiding members are stacked together so as to create the coupling-in surface formed by said lateral coupling-in surfaces abutting each other at their long sides, and wherein the coupling-out surface is created by said lateral coupling-out surfaces abutting each other at their short sides.

Support for the amendments to claim 1 (as well as for claim 10) can be found in the specification at least on page 6, lines 6-7; page 7, lines 1-4; and FIGs. 1-3. With respect to the amendment to claim 5, support can be found in the specification at least on page 6, lines 24-29; page 7, lines 1-4; page 9, lines 21-24; and FIGs. 1-3. With respect to the amendment to claim 8, support can be found in the specification at least on page 5, lines 1-8; page 8, lines 1-5; and FIGs. 1-3. New claims 11-20 are supported by the specification and claims, as originally filed.

Claims 1-2, 5-6 and 8-10 were rejected under 35 U.S.C. § 102(b) as being anticipated by **Karasawa** (US 4,824,194).

The PTO provides in MPEP § 2131 that

"[t]o anticipate a claim, the reference must teach every element of the claim...."

Therefore, with respect to claims 1 and 10, to sustain this rejection the **Karasawa** patent must contain all of the above claimed elements of the respective claims. However, contrary to the examiner's position that all elements are disclosed in the **Karasawa** reference, the latter reference <u>does not</u> disclose "... each light-guiding member being configured in the form of a *substantially* planar *plate* and having ... *two* lateral *outer surfaces* bordering the rectangular lateral coupling-in surface *configured to* 

narrow an angular distribution of light radiation around the first main direction ..." as is recited in claim 1. Therefore, the rejection is not supported by the **Karasawa** reference and should be withdrawn.

In contrast, **Karasawa** discloses a light guide formed of a plurality of *strip-like* light guide materials, each of a given width and length (See FIGs. 1 and 2 of Karasawa) and the strip-like portions are bent right-ward towards the shortest strip-like portion (Karasawa at Col. 4, lines 40-41). Accordingly, the **Karasawa** reference <u>does not</u> disclose "... each light-guiding member being configured in the form of a *substantially* planar *plate* and having ... *two* lateral *outer surfaces bordering* the rectangular lateral coupling-in surface *configured to narrow* an angular distribution of light radiation *around* the first main direction ..."

Accordingly, claims 1 and 10 are allowable and an early formal notice thereof is requested. Dependent claims 2, 5-6 and 8-9 depend from and further limit independent claim 1 and therefore are allowable as well.

# Rejection under 35 U.S.C. §103

Claims 3-4 and 7 were rejected under 35 U.S.C. § 103(a) as being unpatentable over **Karasawa** (US 4,824,194).

With respect to claims 3-4 and 7, Applicant respectfully traverses this rejection for at least the following reason. Dependent claims 3-4 and 7 depend from and further limit independent claim 1 and therefore is allowable as well for at least the reasons set forth above with respect to amended claim 1. The 35 U.S.C. § 103(a) rejection thereof has now been overcome.

#### **Conclusion**

Except as indicated herein, the claims were not amended in order to address issues of patentability and Applicants respectfully reserve all rights they may have under the Doctrine of Equivalents. Applicants furthermore reserve their right to reintroduce subject matter deleted herein at a later time during the prosecution of this application or a continuation application.

It is clear from all of the foregoing that independent claims 1 and 10 are in condition for allowance. Dependent claims 2-9 and 11-20 depend from and further limit independent claim 1 and therefore are allowable as well.

The amendments herein are fully supported by the original specification and drawings; therefore, no new matter is introduced. An early formal notice of allowance of claims 1-20 is requested.

Respectfully submitted, /Michael J. Balconi-Lamica/

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